

**Consultation Response from KC,
Lead Local Flood Authority**

2024/92576 site of, Former Spotted Cow Pub, New Hey Road, Oakes, Huddersfield, HD3 4BU

Discharge of details reserved by conditions 3 (CMP), 21 (retaining walls), 23 (surface water) and 28 (non-native species) of previous permission 2021/94029 for demolition of existing structures and erection of foodstore (class E) with associated access, parking, servicing areas and landscaping

Date Responded: 25th October 2024

Responding Officer: Paul Farndale

Responding Ref:

Condition 23 – Surface Water

Cellular storage is not recommended for major applications due to the LPA's obligation to ensure effective maintenance and management of SUDS. Other systems allow internal inspections for both siltation, deformation, and failure and are easier to clean.

However, the use on commercial sites has been allowed by Kirklees Council in the past and is treated differently from residential developments. A specific manufacturer must be selected, and the product presented in plan and cross section form. A full bespoke maintenance plan must be produced that includes a replacement period. This must be based on CDM regulations and provide a method statement including itinerary and schedule of tasks. This will be extended to the flow control device. Any removal of the flow control device should state that the neoprene seal will be replaced at this juncture.

In our experience, manufacturers do not offer any guarantees on longevity of the product itself, although they may do so on installation defects, such as sealing the membrane. Without carrying a British Standard or Water Industry Standard, there is no standard certification relating to longevity. It has been noted that BBA certification is applied to some products, and these might suggest an estimated lifespan only. With the inability of most products to be routinely cctv surveyed for defects, unlike boxed culverts and oversized pipes, an arbitrary lifespan is required. Unless evidence can be provided to the contrary, these products must be replaced after 25 years. This must be included in the maintenance and management plan. Where failure of the product is suspected, then excavation and replacement will come sooner.

We do NOT recommend that this condition is discharged at this moment in time.